

DANIEL R. MCNUTT (SBN 7815)  
 MATTHEW C. WOLF (SBN 10801)  
 CARBAJAL & MCNUTT, LLP  
 625 South Eighth Street  
 Las Vegas, Nevada 89101  
 Tel.: (702) 384-1170 / Fax.: (702) 384-5529  
[drm@cmlawnv.com](mailto:drm@cmlawnv.com)  
[mcw@cmlawnv.com](mailto:mcw@cmlawnv.com)

*Attorney for Defendants Corporation  
 of the President of The Church of Jesus  
 Christ of Latter-day Saints and  
 Corporation of the Presiding Bishop of  
 The Church of Jesus Christ  
 of Latter-day Saints*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

KRISHAN LAL, KULDIP KAUR, )  
 KANCHAN PAUL, and RANJANA )  
 PAUL, )

Plaintiffs, )

vs. )

MARINA LONG, CORPORATION OF )  
 THE PRESIDENT OF THE CHURCH OF )  
 JESUS CHRIST OF LATTER-DAY )  
 SAINTS, CORPORATION OF THE )  
 PRESIDING BISHOP OF THE CHURCH )  
 OF JESUS CHRIST OF LATTER DAY )  
 SAINTS, DOES I through X, inclusive; )  
 and ROE CORPORATIONS I through X, )  
 inclusive, )

Defendants. )

Case No. 2:15-cv-00658-JCM-GWF

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO STAY DISCOVERY  
 AND MOTION PRACTICE  
 PENDING A PRIVATE  
 MEDIATION BETWEEN THE  
 PARTIES**

Defendants Corporation of the President of The Church of Jesus Christ of  
 Latter-day Saints ("COP") and Corporation of the Presiding Bishop of The Church of Jesus  
 Christ of Latter-day Saints ("CPB") (COP and CPB are collectively "The Church  
 Defendants"), through the law firm Carbajal & McNutt LLP, Plaintiffs Krishan Lal, Kuldip  
 Kaur, Kanchan Paul, and Ranjana Paul (collectively "Plaintiffs"), through the Law Office of

1 Julie A. Mersch and Craig P. Kenny & Associates, Counter-Defendant Krishan Lal, through  
2 the Harper Law Group, and Defendant Marina Long, through the law firm Kolesar &  
3 Leatham, hereby stipulate to stay discovery and motion practice, so as to afford adequate  
4 time for the Parties to prepare for and participate in a private mediation.

5 The Parties hereby stipulate and agree to the following terms:

6 1. The Parties shall participate in a private mediation in Las Vegas,  
7 Nevada (hereinafter, the "Mediation") in a good faith effort settle and resolve all  
8 claims in this litigation.

9 2. The Mediation shall be conducted by Gene Porter.

10 3. The Mediation shall occur no sooner than the middle of February 2016,  
11 subject to the availability of the Parties and their representatives.

12 4. The specific conditions and particulars of the private mediation have  
13 been agreed to by the parties and are not set forth herein.

14 5. To accommodate the Mediation, the Parties stipulate and agree to stay  
15 all existing discovery deadlines, ECF No. 37, and to refrain from filing any motions  
16 until March 1, 2016. Good cause exists for the entrance of this stay. The stay will  
17 maximize the chance of this case being resolved at the Mediation by (1) allowing the  
18 Parties to focus their attention upon the Mediation, and (2) minimizing the Parties'  
19 fees and costs prior to the Mediation.

20 6. On March 1, 2016, the Parties shall file a status report advising this  
21 Court whether a settlement agreement has been reached. If no settlement agreement  
22 has been reached, then on that date, the Parties also will submit a stipulation and  
23 proposed order to extend the existing discovery deadlines. (ECF No. 37.) Discovery  
24 deadlines that have already expired as of the date of this Stipulation and Order shall  
25 not be revived.

26 7. This request is made in good faith and not for purposes of delay.  
27  
28

IT IS SO STIPULATED on December 31, 2015.

CARBAJAL & MCNUTT, LLP

KOLESAR & LEATHAM

/s/ Matt Wolf

/s/ William Schuller

DANIEL R. MCNUTT (SBN 7815)  
MATTHEW C. WOLF (SBN 10801)  
625 South Eighth Street  
Las Vegas, Nevada 89101

WILLIAM D. SCHULLER (SBN 11271)  
RYAN S. PETERSEN, ESQ. (SBN 10715)  
400 S. Rampart Blvd, Suite 400  
Las Vegas, Nevada 89145

*Attorneys for Defendants Corporation of the  
President of The Church of Jesus Christ of  
Latter-day Saints and Corporation of the  
Presiding Bishop of The Church of Jesus Christ  
of Latter-day Saints*

*Attorneys for Defendant Marina Long*

HARPER LAW GROUP

THE LAW OFFICE OF JULIE A. MERSCH

/s/ James Harper

/s/ Julie Mersch

JAMES E. HARPER (SBN 9822)  
1935 Village Center Circle  
Las Vegas, Nevada 89134

JULIE A. MERSCH (SBN 4695)  
701 S.7th Street  
Las Vegas, NV 89101  
Attorney for *Plaintiffs*

*Attorney for Counter-Defendant Krishan Lal*

CRAIG P. KENNY & ASSOCIATES

/s/ Larry Mittin

LEON R. SYMANSKI (SBN 8686)  
LAWRENCE E. MITTIN (SBN 5428)  
501 S. 8th Street  
Las Vegas, NV 89101

*Attorneys for Plaintiffs*

IT IS SO ORDERED:

  
\_\_\_\_\_  
GEORGE FOLEY, JR.  
United States Magistrate Judge

DATED: January 4, 2016